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November 27, 2023

VIA ECF

Arun Subramanian, U.S.D.J.
United States District Court, Southern District of New York
500 Pearl Street, Courtroom 15A
New York, NY 10007

Re: *Anderson v. Amazon.com, Inc., et al.*,
No. 23-cv-08347

Dear Judge Subramanian:

This firm represents the defendants Amazon.com, Inc., Amazon.com Services LLC (incorrectly named as Amazon.com Services, Inc.), Steve Boom and Ryan Redington (collectively, "Defendants"). I write to advise the Court that Defendants intend to move to dismiss the Amended Complaint filed in this matter (Docket Doc. No. 24) in its entirety, and to submit the enclosed stipulated briefing schedule to be So Ordered if it pleases the Court.

Counsel for the parties also respectfully request that the initial pretrial conference currently scheduled for December 14, 2023 (*see* Docket Doc. No. 4) be held in abeyance *sine die*, pending disposition of Defendants' motion. Pursuant to the Court's Individual Practices in Civil Cases, Defendants note that this is the first request for an adjournment of the initial conference, and that this request is made on the consent of all parties.

Respectfully submitted,

Davis Wright Tremaine LLP

/s/

Michael Goettig

Encl.

Cc: Jessie M. Djata, counsel for plaintiff

The proposed schedule is DENIED. Defendants' answers or motions were due yesterday and today. *See* Dkts. 35, 36. As noted in this Court's Individual Practices, extension requests made less than two business days before the deadline are unlikely to be granted. Rule 3(E). As a courtesy, the Court will extend Defendants' motion deadline to December 5, 2023. Plaintiff's response will be due December 19, 2023. Defendants' reply will be due January 2, 2024. SO ORDERED.

A handwritten signature in black ink, appearing to read 'Arun Subramanian'.

Arun Subramanian, U.S.D.J.
Date: November 28, 2023

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

----- x
KEESHA ANDERSON,

Plaintiff,

- against -

AMAZON.COM, INC., AMAZON.COM
SERVICES, INC., STEVE BOOM and RYAN
REDINGTON,

Defendants.
----- x

Case 1:23-cv-08347 (AS)

STIPULATION AND ORDER

WHEREAS, the plaintiff Keesha Anderson (“Plaintiff”) filed the Amended Complaint in this action on October 26, 2023, and

WHEREAS, Plaintiff and Amazon.com, Inc., Amazon.com Services, Inc., Steve Boom and Ryan Redington (collectively, “Defendants”) intend to move the Court to dismiss the Amended Complaint in its entirety,

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned counsel for the parties as follows:

1. Defendants shall file documents in support of their motion to dismiss the Amended Complaint on or before December 13, 2023;

2. Plaintiff shall file documents in opposition to Defendants’ motion to dismiss the Amended Complaint on or before February 5, 2024; and

3. Defendants shall file reply documents in further support of their motion to dismiss the Amended Complaint by no later than twenty-one (21) days following the filing of Plaintiff’s opposition papers.

Dated: New York, New York
November 23, 2023

JMD LAW GROUP

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SO ORDERED:

Hon. Arun Subramian
U.S. District Judge